

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,	)	CASE NO. 1:19-cv-145
	)	
Plaintiff,	)	JUDGE DAN AARON POLSTER
	)	
v.	)	MAGISTRATE JUDGE
	)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO,	)	
LLC, <i>et. al.</i> ,	)	
	)	
Defendants.	)	

---

FOURTH SUPPLEMENT TO FIRST RECEIVER REPORT

RESPONSE TO THE UNITED STATES DEPARTMENT OF EDUCATION  
LETTER OF FEBRUARY 27, 2019

---

Mark E. Dottore, the duly appointed and acting receiver for the Receivership Entities (the “**Receiver**”), hereby files this Fourth Supplement to his first Report (the “**First Report**”)<sup>1</sup> to provide the Court with a copy of the letter denying Title IV funds to Argosy University (attached hereto as Exhibit A) and the Receiver’s response to that letter, which is attached hereto as Exhibit B, and which will be sent via federal express overnight courier today.

---

<sup>1</sup> Capitalized terms used but not defined in this motion shall have the meanings given to them in the Initial Receiver Order as modified by the Clarifying Order (collectively, the “**Receiver Order**”).

Date: March 8, 2019

**WHITMER & EHRMAN LLC**

/s/ Mary K. Whitmer

Mary K. Whitmer (0018213)

James W. Ehrman (0011006)

2344 Canal Rd., Suite 401

Cleveland, OH 44114

Telephone: (216) 771-5056

Facsimile: (216) 771-2450

Email: mkw@weadvocate.net

jwe@weadvocate.net

*Attorneys for the Receiver*